



## Department of Energy

Washington, DC 20585

July 11, 2002

Air and Radiation Docket and Information Center (6102)  
Attention: Docket Number A-98-29  
U.S. EPA  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Dear Sir or Madam:

The Department of Energy (DOE) has reviewed the Environmental Protection Agency's proposed rule, "National Emission Standards for Hazardous Air Pollutants: Engine Test Cells/Stands," published in the May 14, 2002, *Federal Register* (67 FR 34547). Enclosed please find two copies of the Department's comments and recommendations on the proposed regulations based on our review of their potential impacts on DOE operations and facilities.

The Department appreciates the opportunity to comment on the proposed rule. If there are any questions concerning the enclosure, please contact Donna Green of DOE's Chicago Operations Office (630-252-2264; [Donna.Green@ch.doe.gov](mailto:Donna.Green@ch.doe.gov)) or Ted Koss of my staff (202 586-7964; [theodore.koss@eh.doe.gov](mailto:theodore.koss@eh.doe.gov)).

Sincerely,

A handwritten signature in black ink that reads "Andy Lawrence".

Andy Lawrence  
Director  
Office of Environmental Policy and Guidance

2 Enclosures

cc: Mrs. Kelly Hayes, EPA

**Department of Energy (DOE) Comments on the Environmental Protection Agency's (EPA) Proposed Rule on National Emission Standards for Hazardous Air Pollutants (NESHAP) for Engine Test Cells/Standards  
(Federal Register Vol. 67, No. 93, May 14, 2002)**

1. Applicability of proposed emission limitations to new or reconstructed engine test cells/stands that are minor emitters of hazardous air pollutants (HAP)

The Argonne National Laboratory-East (ANL-E) facility owned by DOE operates an engine testing unit that conducts research with engines for the automotive and locomotive industries. The major emphasis of this unit has been research to improve fuel efficiency and engine durability, as well as to reduce air emissions. Because the unit is a permitted emissions source, emissions from this source have been estimated, tracked, and reported since 1996. Although the engine testing unit has expanded, the level of emissions is still relatively low, with carbon monoxide (CO) emissions at less than 1 ton/yr and total hydrocarbons (THC) emissions at less than 0.5 tons/yr.

Since CO is currently proposed in the rule as a surrogate measure of HAP, and EPA indicates that THC could also represent a comparable measure of HAP emissions, DOE requests that EPA consider establishing a *de minimis* level of CO and THC emissions below which emission controls would not be required, irrespective of the rated horsepower of engines that are tested. For newly-constructed or reconstructed engine test cells/stands subject to the proposed regulations that may be tested intermittently or only for limited periods of time, it is questionable as to whether the application of Maximum Achievable Control Technology would be considered to be economically feasible. DOE staff would be pleased to discuss this issue further with EPA staff.

2. Sections 63.9290, 63.9295 and 63.9300 of the proposed rule indicate that the proposed emissions limitations apply to new or reconstructed engine test cells/stands which are used in whole or in part for testing internal combustion engines with a rated power of 25 horsepower (19 kilowatts) or more, and which are located at major sources of air pollutants.

DOE requests that EPA provide further clarification on two issues concerning what constitutes a "reconstructed" engine test cell/stand that is subject to the emission limitations of the proposed rule:

- (a) The ANL-E engine test unit routinely tests engines for a fixed period of time, at which point these engines are removed and replaced by different engines. From DOE's review of the proposed rule, DOE would not interpret the replacement of existing engines with different engines (which is part of the normal testing cycle) as "reconstruction" as defined in §63.2 of the NESHAP General Provisions, because this is a standard operating practice at engine test cells of this type. DOE requests that EPA address and clarify this issue in the final rule.

(b) From §63.2, the two criteria that constitute a “reconstruction” are: “(1) the fixed capital cost of the new components exceeds 50% of the fixed capital cost that would be required to construct a comparable new source; and (2) it is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act.” Concerning the applicability of §63.2 to reconstructed engine test cells/stands, DOE recommends that EPA clarify what it would consider “technologically and economically feasible.” For test cells configured with a manifold ventilation system, it may be difficult or expensive as a practical matter to isolate “reconstructed” test cell/stands from pre-existing ones for the purpose of installing the required pollution control and emission monitoring equipment.